

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: John Earl Lacy, Debtor

**Case No. 22-50643-KMS
CHAPTER 13**

NOTICE

The above referenced debtor has filed papers with the court to allow payment arrearage.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Dan M. Russell, Jr. United States Courthouse
2012 15th St., Ste. 244
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: July 29, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer Ann Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: John Earl Lacy, Debtor

**Case No. 22-50643-KMS
CHAPTER 13**

MOTION TO ALLOW PAYMENT ARREARAGE

COMES NOW, Debtor, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor fell behind on the plan payments.
3. Debtor is requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in August 2025.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)
Jennifer Ann Curry Calvillo (MS Bar No. 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Allow Payment Arrearage was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4 **UNITED STATES BANKRUPTCY COURT**
5 **SOUTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 JOHN EARL LACY

8 CASE NO: 22-50643-KMS
9 **DECLARATION OF MAILING**
10 **CERTIFICATE OF SERVICE**
11 Chapter: 13

12 On 7/29/2025, I did cause a copy of the following documents, described below,

13 Notice and Motion to Allow Payment Arrearage

14
15
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18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
20 incorporated as if fully set forth herein.

21 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
22 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
23 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.

24 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
25 served electronically with the documents described herein per the ECF/PACER system.

26 DATED: 7/29/2025

27 /s/ Thomas C. Rollins, Jr.
28 Thomas C. Rollins, Jr. 103469
29 Attorney at Law
30 The Rollins Law Firm
31 702 W. Pine Street
32 Hattiesburg, MS 39401
33 601 500 5533
34 trollins@therollinsfirm.com

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3 **UNITED STATES BANKRUPTCY COURT**
4 **SOUTHERN DISTRICT OF MISSISSIPPI**

5 IN RE:
6 JOHN EARL LACY

7 CASE NO: 22-50643-KMS
8 **CERTIFICATE OF SERVICE**
9 **DECLARATION OF MAILING**

10 Chapter: 13

11 On 7/29/2025, a copy of the following documents, described below,
12 Notice and Motion to Allow Payment Arrearage

13
14
15
16
17
18
19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 7/29/2025

24 
25

26 Miles Wood
27 BK Attorney Services, LLC
28 d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 22-50643-KMS
 SOUTHERN DISTRICT OF MISSISSIPPI
 TUE JUL 29 8-32-41 PST 2025

ALLY BANK CO AIS PORTFOLIO SERVICES
 LP
 4515 N SANTA FE AVE DEPT APS
 OKLAHOMA CITY OK 73118-7901

LVNV FUNDING LLC
 PO BOX 10587
 GREENVILLE SC 29603-0587

LVNV FUNDING LLC
 CO RESURGENT CAPITAL SERVICES
 PO BOX 10587
 GREENVILLE SC 29603-0587

(P) NATIONSTAR MORTGAGE LLC
 PO BOX 619096
 DALLAS TX 75261-9096

NATIONSTAR MORTGAGE LLC DBA MR COOPER
 PO BOX 619096
 DALLAS TX 75261-9096

EXCLUDE

~~US BANKRUPTCY COURT~~
~~DAN M RUSSELL JR US COURTHOUSE~~
~~2012 15TH STREET SUITE 244~~
~~GULFPORT MS 39501 2036~~

ADRIENE WALLACE
 66 COUNTY RD 170
 QUITMAN MS 39355

ADVANCED COLLECT
 1825 24TH AVE
 MERIDIAN MS 39301-3116

ALLY BANK CO AIS PORTFOLIO SERVICES
 LLC
 4515 N SANTA FE AVE DEPT APS
 OKLAHOMA CITY OK 73118-7901

ALLY FINANCIAL
 PO BOX 380901
 MINNEAPOLIS MN 55438-0901

AMEX
 PO BOX 981537
 EL PASO TX 79998-1537

BABERS LEASING
 423 AZALEA DR
 WAYNESBORO MS 39367-2624

CAPITAL ONE
 PO BOX 31293
 SALT LAKE CITY UT 84131-0293

CAPITAL ONE BANK (USA) NA
 BY AMERICAN INFOSOURCE AS AGENT
 4515 N SANTA FE AVE
 OKLAHOMA CITY OK 73118-7901

DELPHIA J BARNES
 21 WILLIE LINDSEY DR
 COLLINS MS 39428-7346

ELIZABETH CROWELL PRICE ESQ
 FOR NATIONSTAR MORTGAGE LLC
 1820 AVENUE OF AMERICA
 MONROE LA 71201-4530

JALIN LACEY
 551 BIG ROCK RD
 WAYNESBORO MS 39367-9688

KIMBERLY D PUTNAM ESQ
 DEAN MORRIS LLC
 FOR NATIONSTAR MORTGAGE LLC
 1820 AVENUE OF AMERICA
 MONROE LA 71201-4530

LOGS LEGAL GROUP LLP
 BEHALF OF NATIONSTAR MORTGAGE LLC
 DBA MR COOPER
 1080 RIVER OAKS DRIVE SUITE B-202
 FLOWOOD MS 39232-7603

EXCLUDE
~~(D) LVNV FUNDING LLC~~
~~PO BOX 10587~~
~~GREENVILLE SC 29603-0587~~

EXCLUDE
~~(D) LVNV FUNDING LLC~~
~~CO RESURGENT CAPITAL SERVICES~~
~~PO BOX 10587~~
~~GREENVILLE SC 29603 0587~~

MS DEPT OF REVENUE
 BANKRUPTCY SECTION
 PO BOX 22808
 JACKSON MS 39225-2808

MSDHS
 ATTN CONSTANCE MORROW
 PO BOX 352
 JACKSON MS 39205-0352

MONEYKEY
 3422 OLD CAPITOL TRAIL
 STE 1613
 WILMINGTON DE 19808-6124

MR COOPER
 8950 CYPRESS WATERS BL
 COPPELL TX 75019-4620

EXCLUDE
~~(D) (P) NATIONSTAR MORTGAGE LLC~~
~~PO BOX 619096~~
~~DALLAS TX 75261 9096~~

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

NAVIENT
PO BOX 3229
WILMINGTON DE 19804-0229

NETWORK SERVICES INC
PO BOX 1725
HATTIESBURG MS 39403-1725

PERCY HARRIS
PO BOX 433
SHUBUTA MS 39360-0433

PERSONIFY
PO BOX 500650
SAN DIEGO CA 92150-0650

PINK DOGWOOD 13 LLC
PO BOX 1931
BURLINGAME CA 94011-1931

PROSPER FUNDING LLC
221 MAIN STREET
SAN FRANCISCO CA 94105-1906

PROSPER MARKETPLACE INC
CO WEINSTEIN RILEY PS
2001 WESTERN AVE STE 400
SEATTLE WA 98121-3132

(P) REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

EXCLUDE
~~(P) REPUBLIC FINANCE LLC~~
~~282 TOWER RD~~
~~PONCHATOULA LA 70454-8318~~

SCOLOPAX LLC
CO WEINSTEIN RILEY PS
2001 WESTERN AVE STE 400
SEATTLE WA 98121-3132

SEARS
701 E 60TH STREET N
SIOUX FALLS SD 57104-0432

SYNCBJCI HOME DESIGN
PO BOX 965036
ORLANDO FL 32896-5036

SYNCBBELK DUAL CARD
PO BOX 965029
ORLANDO FL 32896-5029

SYNCHRONY BANK
PO BOX 965007
ORLANDO FL 32896-5007

EXCLUDE
~~UNITED STATES TRUSTED~~
~~501 EAST COURT STREET~~
~~SUITE 6 430~~
~~JACKSON MS 39201-5022~~

(P) UPGRADE INC
2 N CENTRAL AVE
10TH FLOOR
PHOENIX AZ 85004-4422

UPSTART FINANCE
2 CIRCLE STAR WAY
SAN CARLOS CA 94070-6200

UPSTART NETWORK
PO BOX 1931
BURLINGAME CA 94011-1931

VISA
PO BOX 31279
TAMPA FL 33631-3279

WELLS FARGO BANK NA
PO BOX 14517
DES MOINES IA 50306-3517

WORLD ACCEPTANCE CORP
PO BOX 6429
GREENVILLE SC 29606-6429

WORLD FINANCE
WORLD ACCEPTANCE CORPORATION
ATTN BANKRUPTCY
PO BOX 6429
GREENVILLE SC 29606-6429

EXCLUDE
~~(P) DAVID RAWLINGS~~
~~ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE~~
~~PO BOX 566~~
~~HATTIESBURG MS 39403-0566~~

JENNIFER A CURRY CALVILLO
THE ROLLINS LAW FIRM
702 W PINE ST
HATTIESBURG MS 39401-3836

DEBTOR
JOHN EARL LACY
6179 HWY 45 N
WAYNESBORO MS 39367-9073

EXCLUDE
~~THOMAS CARL ROLLINS JR~~
~~THE ROLLINS LAW FIRM PLLC~~
~~PO BOX 13767~~
~~JACKSON MS 39236-3767~~